UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

April 9, 1997

REPLY TO THE ATTENTION OF:

SE-5J

TRANSMISSION VIA FACSIMILE AND THE U.S. MAILS

Mr. Raymond Carcione,
Foundry Sales & Supply, Inc.
C/O Mr. Aaron Bulloff
Kadish, Hinkel & Weibel
2112 E. Ohio Building
Cleveland, Ohio 44114

Dear Sir:

RE: GHR Foundry Site
Dayton, Montgomery County, Ohio

Technical Review of the Draft Removal Action Work Plan Dated March 5, 1997

U.S. EPA Administrative Order on Consent No. **V-W-97-C-388**

The United States Environmental Protection Agency (U.S. EPA) has completed a technical review of the "Draft Removal Action Work Plan " (Plan) submitted on March 5, 1997 by your contractor, Roy F. Weston, Inc. (Weston) of Cincinnati, Ohio for the GHR Foundry Site (Site) in response to the above-referenced Administrative Order on Consent (AOC) issued February 25, 1997. This letter addresses U.S. EPA's concerns and comments on the Draft Work Plan submitted for this Site located in Dayton, Ohio. Similarly, the U.S. EPA has requested comments on this Plan from the City of Dayton and the State of Ohio's environmental authorities, and their comments have been incorporated into this technical review and commentary report.

There are certain threshold concerns with respect to this Plan that this letter will discuss first, to be followed by some specific comments on the plan as submitted in its present form. Because these comments are significant it would be best to have the parties address these issues in the Plan and then resubmit the document to the U.S. EPA in its final form.

EPA's general and specific review comments are presented as follows:

Work Plan General Comments:

The Plan in its present form proposes to address removal of

polychlorinated biphenyls (PCBs), asbestos, and otherwise unspecified volatile and semi-volatile organic chemical constituents as contamination on this property. However, there is no mention whether restoration of this industrial property is forthcoming as a postremoval consideration for this Site. The U.S. EPA is concerned that such an oversight might result in a failure to incorporate Brownsfield initiatives as was this Agency's understanding of which this removal undertaking was to be predicated.

As well, the Plan in its present form provides only a sketchy outline of measures to prevent potential contamination of residential areas off and away from this Site while the removal is occurring, and furthermore such measures as they are only cursorily or assumed to be proposed do not assure U.S. EPA that such contamination will actually be prevented. In spite of assumed dust suppression efforts to restrict off-site releases and air monitoring controls to identify any off-site releases, the potential for PCB and asbestos-laden dusts contaminating adjacent properties and homes as a result of airborne transport and vehicular traffic from the Site and their subsequent migration from the Site during removal activities remains high.

U.S. EPA is not convinced that appropriate measures, based on this Plan will be in place to prevent this contingency. However, an innovative and environmentally protective approach, if proposed in the Plan might be acceptable and if U.S. EPA is assured that strict measures will be taken to prevent all possible contamination of residential and public areas during this removal. Otherwise, U.S. EPA shall require extensive confirmatory post-removal sampling and analysis at the culmination of the removal at this Site.

In the submittal of the final or revised Work Plan, your contractor, Weston, must fully explain what actions will be taken with regard to potential off-site contamination while sampling, excavation, and removal operations are taking place. Ideally, an entire section in the Work Plan should be devoted to a full, textual description of site activities during the clean-up and it should also be mentioned in the Scope of Work. As well, possible surface and groundwater contamination impacts should be discussed and considered.

As required, the Plan includes a site-specific Site Safety and Health Plan which should address all contingencies, health risk analyses of the site contaminants including material safety data sheets, site control and standard operating procedures, decontamination procedures, hazard communication, air monitoring and action levels as well as medical monitoring requirements. However, this portion of the Work Plan falls short of specific

requirements in that the hospital route map provided is cumbersome and subject to confusion in an emergency and, as such, it should be reduced to identify essential streets **only** from this Site for transport to the hospital. Copies of this simplified route should be posted within the work area so that all responsible personnel can become familiar with the route and readily see it. Similarly, no mention is made that any person has followed the route to the hospital to become familiar with it.

Also, there is no discussion whether the or a local hospital has been previously notified of the potential chemical exposure hazards at this Site so that such hospital personnel will be able to aptly and expeditiously respond should such an emergency occur. Fulfillment of this requirement is axiomatic.

As well, this Work Plan is to contain a site-specific and complete sampling quality assurance/quality control plan. The need for identifying data validation procedures is moot. This document, better known as the Sampling and Analysis Plan or SAP, shall include the Quality Assurance Project Plan or QAPP, and, of equal importance, the Field Sampling Plan or FSP which contains and clearly defines the number of samples to be collected, the sample type or matrix, sampling location, and the required analyses.

Essentially, the data quality objectives (DOQs) need to be established in the work plan prior to the commencement of any site-specific work. It is also the U.S. EPA's impression while examining this SAP that all of the contaminants listed on pages 4-2 and 4-3 are known to be present or pre-eminent upon this Site. In a word, will all listed analyses be used or is this just a survey of what's available in the contractor's inventory ?

The Work Plan must address City of Dayton and Ohio Environmental Protection Agency (OEPA) site-specific Applicable or Relevant and Appropriate Requirements (ARARs), and a statement must be included that such ARARs will be complied with to the maximum practicable extent.

Work Plan Specific Comments:

Introduction, Page 1-2, Section 1.3:

Inasmuch as the **Regulatory Background** is discussed for this Site, it is advisable to mention that a TSCA (Toxic Substances Control Act) action is also ongoing for this Site since the cleanup activities indicated in this work plan will serve to eliminate much of the deficiencies which are sought to be resolved by that action as well.

Part 2, **Scope of Work**, Page 2-4, First paragraph:

Please clarify why samples collected from each UST will be composited for analysis rather that individually sampled and analyzed. Without knowing the contents of each UST, compositing may present a danger to the samplers because of incompatibility and possible uncontrolled reactions.

Page 2-5, First and Second paragraphs:

Continuous use of the phrase, "use of field screening techniques" is so predominant here and without explanation that the term requires clarification.

Page 2-5, Fourth paragraph:

Describe how the "subcontractor" is to be qualified.

Page 2-6, Section 2.2.3, Second paragraph:

Confusion is instilled here with the concept "....below which may be recycled." Please clarify what is proposed here with respect to PCBs found to be at concentrations below 50 ppm.

Page 2-7, Section on Capacitors:

What is the determinant for PCBs at concentrations greater than 500 ppm to be incinerated ?

Page 2-8, Third paragraph:

Identify the type of air quality monitoring to be done here, i.e., use of a mini-RAM, high volume particulate sampler, and will the duration of the monitoring be for 24 hours or less ?

Part 3, **Reporting**, Page 3-1:

Correct the line concerning **significant developments** to state that **all developments** will be reported.

Part 4, **Schedule**, Page 4-1, Figure 4:

Revise the proposed schedule to reflect the altered time periods which this removal will now encompass. Too, it is apparent that some of the time estimates may be too restricted as to be almost unattainable especially regarding removal & disposal.

APPENDIX A, Sampling and Analysis Plan

Figure 1, Site Location, and Figure 2, Site Plan:

Both figures are either too poorly reproduced or inadequately prepared to show the location and **proximity** of the Madd River in relation to this Site. This deficiency requires correction.

Part 2, **Project Organization and Responsibility**, Page 2-2, Figure 2-1, Project Team Organization:

For reporting purposes, the U.S. EPA Region V and U.S. EPA OSC may be combined into one box with the line of reporting **directly** extending to the Weston Project Director and an indirect reporting shown to the U.S. EPA and/or OSC from the Weston Project Manager. Provision should also be made for an indirect reporting to Weston Project Directors and Managers to a U.S. EPA oversight contractor known as **START** (Superfund Technical Assistance Removal Team) when the OSC is not present on the site or is not available.

Part 3, **Sampling Plan**, Page 3-2, First paragraph:

Explain how an " EPA-approved laboratory " is determined.

Part 3, Section 3.2, Page 3-2, **Room G Section**, third to last sentence:

Explain the composite sampling by appearance phenomenon. How is this to be accomplished, through looks, feel, smell, use of compatibility tests ?

Page 3-3, Section 3.3, Transformers/Capacitors:

Will the use of the "same dipstick....for all transformer sample events" compromise sample integrity using this technique ? Explain and give explanations why this should not occur.

Page 3-4, Section 3.4, Building Materials:

How often will the air samplers be read ? Note also that in Appendix 'B' entitled," Site Air Monitoring Program - Ambient Air Monitoring " has the portion " **no** air monitoring required on this site " checked. Why is there such a significant discrepancy ?

As a final note with regard to sampling, please note that sample results are more reliable when samples are first dried.

Part 4, Analytical Program:

Varied tests and instrumentation are identified for **Field Screening Technology**. Comment on the level of accuracy of these tests and instruments if they're for use in screening or identified as available in the inventory for use.

Section 4.2, Pages 4-4 to 4-7:

Varied RCRA/TSCA analytical procedures are listed in this section without clear recourse to or description of when a given analyses will be indicated. Is the U.S. EPA supposed to assume that ach of these analytical procedures will be applied for each and every sample obtained from the GHR Foundry Site ? In this section, the basis for a given analytical protocol and when it is to be employed should be clearly stated. This site-specific information should be fully described in the Sampling and Analysis Plan (SAP) which includes the Field Sampling Plan (FSP) and the Quality Assurance Project Plan (QAPP).

Part 5, **Data Reduction, Reporting and Validation**:

Page 5-1, Section 5.1.2:

Add the following phrase after the words "....are retained on file for a minimum of 6 years " **and shall be available for EPA's inspection upon request.**

Section 5.4, Data Validation, Page 5-4:

The second sentence wording "....and no data validation will be performed" is to be replaced with the words " and data validation **shall** be performed."

Part 6, Quality Assurance/Quality Control:

In all instances where the varied field instruments are to be used, the words " nonconforming and will not be used " should be followed by the words "**and will be replaced with functional instruments.**"

Page 6-24, Section 6.7.3.2:

Appropriately insert the words, **No deviations from the Work Plan shall occur prior to U.S. EPA approval**, in this section.

The above represents the extent of U.S. EPA's commentary for the GHR Foundry Work Plan. Please note that all comments and suggestions are to be addressed and included where appropriate into the final work plan. The U.S. EPA's approval of the Plan is forthcoming pending insertion of the above-prescribed corrections to this Plan. Also be aware that this work plan becomes part of the AOC and is fully enforceable under that Order's requirements. Note also that the U.S. EPA may modify or request additional inputs to the Plan if new information concerning this Site emerges or additional scientific knowledge requires alteration of a proposed action for this Site.

Please contact me at telephone number 312/353-7615 to arrange a meeting or to discuss the above comments and all questions you may have prior to preparing your final work plan in response to and regarding these comments.

Very truly yours,

Paul R. Steadman,
On-Scene Coordinator
Emergency and Enforcement Response Branch
Superfund Division

cc: D. Hall, City of Dayton
T. Buchan, Ohio Env. Prot. Agency
J. Bartley/B. White/K.Arthur, Weston, Inc.
J. Cahn, ORC (CS-29A)
A. Lilly, ESS (SE-5J)
F. Rollins, RS-III (SE-5J)